

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

JAMES KEITT,	)	
	)	
Petitioner,	)	Civil Action No. 04-362(E)
	)	
v.	)	Judge Sean J. McLaughlin
	)	Magistrate Judge Susan Paradise Baxter
UNITED STATES PAROLE COMMISSION,	)	
DISTRICT OF COLUMBIA BOARD	)	
OF PAROLE,	)	
	)	filed electronically
Respondents.	)	

**MOTION TO ENLARGE TIME IN WHICH TO RESPOND  
TO PETITIONER'S OBJECTIONS TO  
MAGISTRATE JUDGE'S REPORT AND RECOMMENDATION**

AND NOW, come Respondents, by their attorneys, Mary Beth Buchanan, United States Attorney for the Western District of Pennsylvania, and Christy Wiegand, Assistant U.S. Attorney, and respectfully request this Honorable Court to enter an Order enlarging the time in which to file a response to Petitioner's Objections to the Report and Recommendation filed in this matter for the following reasons:

1. On May 16, 2006, Magistrate Judge Baxter issued her Report and Recommendation ("R & R") in this case, in which she recommended that Petitioner's Petition for Writ of Habeas Corpus be denied. In accordance with 28 U.S.C. § 636(b)(1)(B) and (C) and Rule 72.1.4(B) of the Local Rules for Magistrates, the parties were allowed ten (10) days from the date of service to file objections to the R & R. Any party opposing such objections is required to file a response thereto within seven (7) days from the date of service of the objections.

2. On May 24, 2006, Petitioner moved the Court for an extension of time to file his objections to the R & R. The Court granted Petitioner's Motion, and Petitioner filed his Objections

to the R & R on June 5, 2006.

3. Respondent was served with Petitioner's Objections on June 6, 2006. Pursuant to the R & R, Respondent's Response to Petitioner's Objections is due June 15, 2006.

4. Due to the necessity of communicating and coordinating with counsel for the Parole Commission, additional time will be needed to file a Response to Petitioner's Objections.

5. As a result, Respondents respectfully request an enlargement of time of an additional fifteen (15) days within which to file a Response to Petitioner's Objections to the Magistrate Judge's Report and Recommendation.

#### CONCLUSION

WHEREFORE, for the foregoing reasons, Respondents respectfully request that this Honorable Court enter an Order enlarging the time in which to file a Response to Petitioner's Objections to the Magistrate Judge's Report and Recommendation by an additional fifteen (15) days, or until June 30, 2006.

Respectfully submitted,

MARY BETH BUCHANAN  
United States Attorney

s/ Christy Wiegand  
CHRISTY WIEGAND  
Assistant U.S. Attorney  
U.S. Courthouse and Post Office  
700 Grant Street, Suite 4000  
Pittsburgh, PA 15219  
(412) 644-3500  
Counsel for the Respondents

**CERTIFICATE OF SERVICE**

I hereby certify that I have served this date a copy of the within *Motion for Enlargement of Time in Which to File Response to Petitioner's Objections to Magistrate Judge's Report and Recommendation*, by mail or electronic filing, upon the following:

James Keitt  
Reg. No. 05240-016  
FCI McKean  
PO Box 8000  
Bradford, PA 16701

s/ Christy Wiegand  
CHRISTY WIEGAND  
Assistant United States Attorney

Date: June 14, 2006